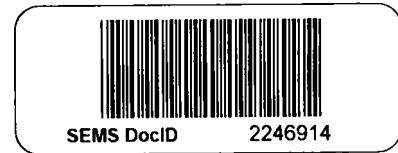


# TECHLAW INC.

8 VALLEY FORGE  
EXECUTIVE MALL  
SUITE 230  
WAYNE, PENNSYLVANIA 19087  
PHONE: (215) 293-0450

PFE  
ORIGINAL  
(Red)

May 6, 1988



## HAND DELIVER

Lawrence Falkin  
U.S. EPA Region III  
Sixth Floor  
841 Chestnut Street  
Philadelphia, PA 19107

Re: U.S. EPA Contract No. 68-01-7331  
CDM FPC Work Assignment No. 849

Dear Larry:

This Status Letter describes TechLaw's research progress on the responsible party search (RPS) for the Metro Container site.

TechLaw has duplicated EPA site related files provided by you and Mr. Doug Fox, the EPA On-Scene Coordinator (OSC). These files contained a partial 104(e) letter response from the current site operator, Metro Container Corp., and a report from the EPA Technical Assistance Team (TAT).

In addition, TechLaw has contacted the following sources:

Pennsylvania Department of Environmental Resources (PADER)  
Norristown Regional Office  
1875 New Hope Street  
Norristown, PA 19401  
(215) 270-1900

Contact: (b) (4), File Clerk

TechLaw contacted PADER's Norristown Office to obtain copies of documentation regarding the site. Ms. Bish provided TechLaw with copies of site files from the Bureaus of Air Quality, Water Quality, and Waste Management. These files included inspection reports and correspondence concerning the site. These documents will be included as an Attachment to the Draft RPS Report.

ORIGINAL PFE  
(Red)

PADER  
Bureau of Waste Management  
Transportation and Reporting Section  
Division of Compliance and Monitoring  
7th Floor, Fulton Building  
P.O. Box 2063  
Harrisburg, PA 17120  
(717) 787-6239

Contacts: Leonard W. Tritt, Section Chief  
Warren Lehman, Clerk

TechLaw contacted PADER's Bureau of Waste Management to obtain copies of documentation regarding the site. Mr. Tritt and Mr. Lehman searched the PADER files for Hazardous Waste Manifests pertaining to the site. PADER did not have any Hazardous Waste Manifests or Hazardous Waste Quarterly Reports regarding the site.

PADER  
Bureau of Waste Management  
Division of Facilities Management  
8th Floor, Fulton Building  
Harrisburg, PA 17120  
(717) 787-7381

Contact: Jim Baker

TechLaw contacted PADER's Bureau of Waste Management to obtain copies of documentation regarding the site. The Division of Facilities Management had no documents regarding the site.

PADER  
Bureau of Water Quality  
Division of Permits and Compliance  
12th Floor, Fulton Building  
Harrisburg, PA 17120  
(717) 787-8184

Contact: Kathi Uniatowski, Clerical Supervisor

TechLaw contacted PADER's Bureau of Water Quality to obtain copies of documentation regarding the site. The Bureau of Water Quality's files contained copies of an NPDES permit, inspection reports, and correspondence concerning the site. These documents will be included as an Attachment to the Draft RPS Report.

ORIGINAL  
(Red)

PFE

PADER  
Bureau of Air Quality  
18th Floor, Fulton Building  
Harrisburg, PA 17120  
(717) 787-4325

Contact: Kim Womer

TechLaw contacted PADER's Bureau of Air Quality to obtain copies of documentation regarding the site. The Bureau of Air Quality files contained copies of a site operating permit and site inspection reports. These documents will be included as an Attachment to the Draft RPS Report.

Delaware County Regional Water  
Quality Control Authority (DELCORA)  
100 East Fifth Street  
P.O. Box 999  
Chester, PA 19016  
(215) 876-5523

Contact: William Ross, Executive Director

TechLaw contacted DELCORA to obtain copies of documentation regarding the site. DELCORA had approximately two feet of site related files. These files contained correspondence, inspection reports, operating permits, and documentation on administrative conferences concerning violations at the site. Documents photocopied by TechLaw will be included as an Attachment to the Draft RPS Report.

New Jersey Department of Environmental Protection (NJDEP)  
Division of Hazardous Waste Management  
Manifest Section  
401 East State Street, Fifth Floor  
Trenton, NJ 08625  
(609) 633-1387

Contact: Jim Buerbig

TechLaw contacted NJDEP's Manifest Section to obtain copies of documentation regarding the site. During an April 4, 1988 telephone inquiry, Mr. Buerbig stated that the NJDEP Manifest Section listed Metro Container Corp., EPA Identification No. PA044545895, as a generator and transporter of hazardous waste, and

ORIGINAL  
(Red) FILE

not as a treatment, storage or disposal (TSD) facility. As subsequently directed by EPA, TechLaw did not obtain copies of waste manifests documenting waste transported from the site.

Delaware County Board of Assessment  
Media, PA 19063  
(215) 891-4888

Contact: Marty Holmes

TechLaw contacted the Delaware County Board of Assessment to obtain a parcel map showing the property boundaries of the site, which Mr. Holmes subsequently provided. On March 31, 1988, TechLaw provided you with a copy of this map.

After first receiving verbal permission from you, TechLaw has also contacted the following individuals:

Brian Boyd (PADER)  
Ridley Creek District Office  
Ridley Creek State Park  
Sycamore Mills Road  
Media, PA 19063  
(215) 565-1687

Mr. Boyd inspected the site on behalf of PADER. TechLaw contacted Mr. Boyd to obtain copies of his site files, and to obtain additional information concerning the site. Mr. Boyd stated over the telephone that his files were not available for public review, and that the few documents concerning the site that he had in his possession were duplicated in PADER's Norristown Regional Office. TechLaw did not obtain any documents from Mr. Boyd, but did conduct a telephone interview with Mr. Boyd. A summary of this interview will be provided in Appendix B of the Draft RPS Report.

Eugene Corby  
Councilman, Borough of Trainer  
4308 Post Road  
Trainer, PA 19013  
(215) 494-4588

Mr. Boyd of PADER recommended that TechLaw contact Mr. Corby. Mr. Corby's files included approximately 30 photographs of the site, personal notes, inspection reports, and correspondence concerning the site. These documents will be included as an Attachment to the Draft RPS Report.

PFE  
ORIGINAL  
(Red)

In addition, TechLaw conducted both a face-to-face and telephone interview with Mr. Corby. A summary of TechLaw's interview with Mr. Corby will be included in Appendix B of the Draft RPS Report.

George F. Shertenlieb  
Councilman, Borough of Trainer  
9th and Main Streets  
Trainer, PA 19013  
(215) 494-0284

Mr. Corby indicated that Mr. Shertenlieb also possessed site related documentation. TechLaw contacted Mr. Shertenlieb to obtain copies of his files and any additional information concerning the site. Mr. Shertenlieb's files included correspondence, several PADER Notice of Violations, a TAT report, site inspection reports, and handwritten notes regarding the site. These documents will be included as an Attachment to the Draft RPS Report.

In addition, TechLaw conducted a face-to-face interview with Mr. Shertenlieb. A summary of TechLaw's interview with Mr. Corby will be included in Appendix B of the Draft RPS Report.

Subsequent to preparing the Work Plan for this Work Assignment, you directed that Techlaw not perform a title search for the site.

TechLaw will review documentation collected from the above sources, and will continue to search for additional public files pertaining to the site. Also, TechLaw will contact the appropriate Secretary of State Offices to obtain and review corporate information concerning parties identified as being affiliated with the site.

After receiving verbal approval from you, TechLaw will conduct additional interviews with individuals knowledgeable about the site.

As you discussed with Joe Weslock of TechLaw on April 26, 1988, TechLaw requires approximately 300 additional LOE hours to complete the tasks listed in the Work Plan. You indicated to me over the telephone on April 26, 1988, that you will initiate a Work Assignment Amendment providing for the additional hours and budget to complete this Work Assignment. At this time, TechLaw anticipates delivering the Draft RPS Report to EPA on July 1, 1988, as specified in the Work Plan.

TECHLAW INC.

Lawrence Falkin  
May 6, 1988  
Page 6

ORIGINAL  
(Reg) FILE

Please contact Joe Weslock or me at (215) 293-0450, to discuss any or all parts of our research.

Sincerely,

*Chip Hooford*

(b) (4)

Regional Manager

BIH/JW

cc: (b) (4), CDM FPC  
(b) (4) Antonio, CDM FPC  
(b) (4)